

REMARKS/ARGUMENTS

The Applicant originally submitted Claims 1-40 in the application. Previously, the Applicant amended Claims 1, 10-11, 20-21, 30-31 and 39. In the present preliminary amendment, the Applicant has amended Claims 1, 11, 21 and 31 in order to expedite issuance. Support for the amendment can be found, for example, in Figure 1 of the original specification. Presently, no other claims have been amended, canceled or added. Accordingly, Claims 1-40 are currently pending in the application.

I. Comment on IDS

The Applicant submits herewith form 1449 of the Information Disclosure Statement that was filed on April 22, 2002.

II. Rejection of Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38 and 40 under 35 U.S.C. §102

The Examiner has rejected Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38 and 40 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,878,130 to Andrews, *et al.* The Applicant respectfully disagrees since Andrews does not teach providing a sole interface between a plurality of access nodes and a main control unit via a circuit-switched matrix and line interface coupled to an input-output distributor as recited in amended independent Claims 1, 11, 21 and 32. Instead, Andrews discloses that agents and callers are connected to central controllers through public networks and telephone network interfaces. (See Figure 12.)

Therefore, Andrews does not teach each and every element of amended independent Claims 1, 11, 21 and 31 and as such, does not anticipating Claims 1, 11, 21 and 31 and Claims dependent thereon. Accordingly, the Applicant respectfully requests the Examiner to withdraw the §102 rejection with respect to Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38 and 40 and allow issuance thereof.

III. Rejection of Claims 2, 10, 12, 20, 22, 30, 32 and 39 under 35 U.S.C. §103

The Examiner has rejected Claims 2, 10, 12, 20, 22, 30, 32 and 39 under 35 U.S.C. §103(a) as being unpatentable over Andrews in view of U.S. Patent Application No. 2003/0128698 by Darland, *et al.* The Applicant respectfully disagrees.

As discussed above, Andrews does not teach each element of amended independent Claims 1, 11, 21 and 31. Additionally, Andrews does not suggest providing a sole interface between a plurality of access nodes and a main control unit via a circuit-switched matrix and line interface coupled to an input-output distributor as recited in amended independent Claims 1, 11, 21 and 31. Instead, Andrews discloses multiple paths between agents, callers and central controllers. (*See* Figure 12.) Thus, Andrews does not teach or suggest each element of independent Claims 1, 11, 21 and 31 as amended.

Darland relates to telecommunications network processing of services. (*See* paragraph 2.) The Applicant does not find where Darland cures the above deficiencies of Andrews nor has Darland been cited to cure the deficiencies of Andrews. The cited combination of Andrews and Darland, therefore, does not provide a *prima facie* case of obviousness of amended independent Claims 1, 11, 21 and 31 and Claims 2, 10, 12, 20, 22, 30, 32 and 39 that depend thereon. Accordingly, the

Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of dependent Claims 2, 10, 12, 20, 22, 30, 32 and 39 and allow issuance thereof.

IV. Rejection of Claims 4, 14, 24 and 34 under 35 U.S.C. §103

Previously, the Examiner rejected Claims 4, 14, 24 and 34 under 35 U.S.C. §103(a) as being unpatentable over Andrews in view of U.S. Patent No. 6,614,783 to Sonesh, *et al.* The Applicant respectfully disagrees.

As discussed above, Andrews does not teach or suggest each element of amended independent Claims 1, 11, 21 and 31. Sonesh relates to telephone automatic call distribution for call centers and particularly to geographically distributed multimedia automatic call distribution system connected to a plurality of voice and data networks. (See column 1, lines 13-19.) Sonesh has not been cited to cure the deficiencies of Andrews and the Applicant does not find where Sonesh cures the above deficiencies of Andrews. The cited combination of Andrews and Sonesh, therefore, do not provide a *prima facie* case of obviousness of amended independent Claims 1, 11, 21 and 31 and Claims 4, 14, 24 and 34 that depend thereon. Accordingly, the Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of dependent Claims 4, 14, 24 and 34 and allow issuance thereof.

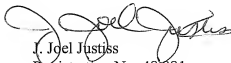
IV. Conclusion

In view of the foregoing amendment and remarks, the Applicant now sees all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-40.

The Applicant requests the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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